

Exhibit 3

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:)
)

MOTORS LIQUIDATION COMPANY)
)
)
)
)

No. _____

Hon. Jesse M. Furman

**[PROPOSED] ORDER GRANTING GENERAL MOTORS LLC’S,
THE MOTORS LIQUIDATION COMPANY GUC TRUST’S, AND ECONOMIC LOSS
PLAINTIFFS’ JOINT MOTION TO WITHDRAW THE REFERENCE OF THE
ECONOMIC LOSS PLAINTIFFS’ MOTION FOR AN ORDER GRANTING
AUTHORITY TO FILE LATE CLASS PROOFS OF CLAIM AND RELATED FILINGS**

On March __, 2020, (i) General Motors LLC; (ii) the Motors Liquidation Company GUC Trust) (the “GUC Trust”); and (iii) plaintiffs seeking to represent classes of purchasers and lessees of the recalled vehicles (collectively, the “Settling Parties”) filed a Joint Motion To Withdraw The Reference Of The Economic Loss Plaintiffs’ Motion For An Order Granting Authority To File Late Class Proofs Of Claim And Related Filings. Docket No. ____ (the “Motion”).¹

Upon consideration of the Settling Parties’ Motion, and for good cause shown, it is hereby ORDERED that:

1. The Settling Parties’ Motion is hereby GRANTED, substantially for the reasons set forth in their memorandum of law in support of the Motion. Docket No. ____.
2. Pursuant to 28 U.S.C. § 157(d), this Court accordingly withdraws, for cause, the reference to the Bankruptcy Court of (i) the Economic Loss Plaintiffs’ Motion For An Order Granting Authority To File Late Class Proofs Of Claim (Bankr. Docket No. 13806); (ii) the Economic Loss Plaintiffs’ Notice Of Filing Of Amended Exhibits To Motion For An Order

¹ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Settlement Agreement.

Granting Authority To File Late Class Proofs Of Claim (Bankr. Docket No. 14280);
(iii) the Joinder Of Certain Ignition Switch, Non-Ignition Switch, And Pre-Sale Accident
Plaintiffs To The Pending Motions For Leave To File Late Proofs Of Claim (Bankr. Docket
No. 13811)²; and (iv) the Joinder Of Groman Plaintiffs To Motion For An Order Granting
Authority To File Late Class Proofs Of Claim (Bankr. Docket No. 13818).³

3. For the avoidance of doubt, this Court does not withdraw the reference with respect to any
other matters currently pending before the Bankruptcy Court, including (i) the GUC Trust
Motion; (ii) the GUC Trust Approval Order; (iii) the Excess Distribution Motion; (iv)
personal injury or wrongful death claims in the Bankruptcy Case relating to the Subject
Vehicles; (v) claims and Actions asserted against the AAT, Old GM or the Old GM
Bankruptcy Estates to the extent such claims or Actions are recoverable solely against the
AAT or its assets; and/or (vi) individual claims or motions, if any, in the Bankruptcy Case
filed by a Person who would have been a Class Member who becomes an Opt-Out.

SO ORDERED.

Dated: _____, 2020
New York, New York

JESSE M. FURMAN
United States District Judge

² This joinder primarily seeks to assert late economic loss claims. However, Sharon Bledsoe, one of the plaintiffs who filed the joinder, seeks to assert both late economic loss claims and a late personal injury claim. The reference is not withdrawn with respect to that portion of this joinder that relates to Ms. Bledsoe's personal injury claim. In addition, the Bankruptcy Court previously denied Celestine Elliott's and Lawrence Elliott's request for permission to file a late proof of claim with respect to their 2006 Chevrolet Trailblazer. Accordingly, that portion of this joinder has been resolved by the Bankruptcy Court and is therefore not subject to this Order.

³ As set forth in the Settlement Agreement, the Economic Loss Plaintiffs and New GM will continue to pursue Proposed Proofs of Claim (as defined in the Settlement Agreement) against the Avoidance Action Trust ("AAT") and its assets in the Bankruptcy Court notwithstanding approval of the Settlement Agreement, and the Settling Parties do not seek to withdraw the reference with respect to such claims against the AAT. Settlement Agreement ¶ 142. Accordingly, the reference is not withdrawn as to the Proposed Proofs of Claim against AAT.